

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Return Date: 6/17/20
Time: 9:30 a.m.

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In Re:

Chapter 13

Case No.: 20-40988-nhl

Denise Clarke,

Debtor.

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**SUPPLEMENTAL RESPONSE TO COURT’S ORDER TO SHOW CAUSE TO DISMISS
CASE**

David Alishaev, the undersigned, of The Alishaev Law Group, attorney for Denise Clarke (the “Debtor”), the Debtor in the above-referenced bankruptcy proceeding, submits this supplemental response to the Court’s Order to Show Cause to dismiss the above-referenced bankruptcy proceeding and states as follows:

1. I am a partner of Alishaev Law Group, attorneys for the Debtor, and as such I am fully familiar with the facts surrounding this bankruptcy case and this motion. I submit this supplemental response to the Court’s Order to Show Cause to Dismiss the above-referenced bankruptcy case for failure to file all of the required schedules and statements pursuant to Section 521 of Title 11 of the United States Code (the “Bankruptcy Code”).

2. In the response that I initially submitted to the Court, I explained that since the filing, the Debtor began negotiating with the Bank for a resolution to the foreclosure action and the Debtor and the Bank are working on a short sale. I also indicated that the Debtor expressed her desire to withdraw the chapter 13 petition.

3. In light of these developments, I explained that this office prepared an application for the Debtor seeking to voluntarily withdraw her petition but we did not receive the application we prepared back from the Debtor. I also explained we were having difficulty getting in contact with the Debtor.

4. Since I filed my response, this office has received from the Debtor via regular mail, the signed application seeking to voluntarily withdraw the chapter 13 petition. I am attaching the application to this response as an Exhibit.

Wherefore, in view of the foregoing, the Debtor has no objection to the Court's order to show cause seeking a dismissal of the above-referenced action and for such other, further and different relief as this Court deems just, proper and equitable.

Dated: Forest Hills, New York
June 16, 2020

The Alishaev Law Group
Attorney for the Debtor

By: _____ David Alishaev _____
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